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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:) Case No.: 2011-28662-B-13J
)
GLENN ALLEN SHAFFNER, JR.) DC NO.: CAH-1
)
AND JEANETTE LOIS SHAFFNER,) **MOTION FOR SUBSTITUTION OF DECEASED**
(deceased)) **PARTY PURSUANT TO FEDERAL RULE OF**
) **BANKRUPTCY PROCEDURE 1004**

DEBTORS

DATE: September 30, 2014
TIME: 9:32 a.m.
JUDGE: Hon. Thomas C. Holman
LOCATION: 501 I Street
6th Floor, Courtroom 32
Sacramento, CA 95814

MOTION FOR SUBSTITUTION OF DECEASED PARTY PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE 1004

Debtor, Glenn Allen Shaffner Jr., by and through his attorney, hereby moves the Court for an Order approving the motion to substitute the Debtor for the deceased Joint Debtor. This motion is being filed pursuant to Federal Rule Of Bankruptcy Procedure 1004.1.

1 1. The debtor's filed for relief under Chapter 13 of the
2 Bankruptcy Code on April, 2011. On June 20, 2011, the debtor's
3 Chapter 13 Plan was confirmed.

4 2. On September 8, 2012 the joint debtor passed away. The
5 Debtor is the lawful successor and representative of the Debtor.

6
7 3. Pursuant to Federal Rule of Bankruptcy Procedure 1004.1, the
8 debtor is requesting authorization to be substituting in for the
9 deceased debtor and to perform the obligations and duties of the
10 deceased party in addition to performing his own obligations and
11 duties.

12 4. In this case the Suggestion of Death was filed on May 9,
13 2014. A copy of the Death Certificate is attached as Exhibit A.
14 The party who wants to be substituted in for the deceased joint
15 debtor is the spouse of the deceased party and is the
16 successor's heir and lawful representative. See Declaration of
17 Debtor. The debtor will continue to prosecute this case in a
18 timely and reasonable manner.

19 WHEREFORE, the debtor, as successor and representative of
20 Jeanette Lois Shaffner, requests an order of substitution be
21 entered substituting Glenn Allen Shaffner Jr. as party in lieu
22 of the deceased joint debtor.

23 Dated: 8/25/2014

24 HUGHES FINANCIAL LAW

25 BY: /s/Aaron C. Koenig
Aaron C. Koenig
Attorney for debtor